

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SHERI WADE

Plaintiff,

v.

INTERWORKS UNLIMITED, INC.

Defendant.

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Case No. 3:18cv828 (MHL)

**PLAINTIFF’S AMENDED WITNESS & EXHIBIT LIST FOR HEARING ON
PLAINTIFF’S THIRD MOTION FOR DEFAULT JUDGMENT**

Plaintiff Sheri Wade (“Ms. Wade”), by counsel, hereby submits her amended witness and exhibit list to the Court in preparation for the November 23, 2021, hearing on Plaintiff’s Third Motion for Default Judgment:

WITNESS LIST

Ms. Wade will call the following witnesses during the November 23, 2021, hearing:

1. Sheri Wade, Plaintiff;
2. Derrick Wade, Plaintiff’s Husband;
3. Vonita Crawley, witness;
4. Elliot Skorupa, MSEP (Master’s Degree in Exercise Physiology); and

EXHIBIT LIST

Ms. Wade will make use of the following exhibits during the November 23, 2021, hearing:

A. Unsworn Declaration of Dr. Bogle;

B. Exhibits to Dr. Bogle’s Unsworn Declaration:

1. Exhibit B1: Dr. Bogle’s Surgery Records: January 9, 2019;
2. Exhibit B2: Dr. Bogle’s Surgery Records: September 14, 2017;

3. Exhibit B3: St. Francis Medical Center – Billing
4. Exhibit B4: Richmond Emergency Physicians – Billing
5. Exhibit B5: Commonwealth Radiology – Billing
6. Exhibit B6: OrthoVirginia Patient Ledger – Billing
7. Exhibit B7: Commonwealth Anesthesia – Billing
8. Exhibit B8: Boulders Ambulatory Surgery Center – Billing
9. Exhibit B9: Physical Therapy Solutions LP – Billing
10. Exhibit B10: Statement of Damages;
11. Exhibit B11: Centers for Work Performance Functional Capacity Evaluation;
12. Exhibit B12: Picture Board – x-rays;
13. Exhibit B13: Picture Board – x-rays;

C. Photographs of the injury:

1. Exhibit C1: Photograph of Plaintiff's Left Arm & Wrist;
2. Exhibit C2: Photograph of Plaintiff's Left Arm Post-Surgery;
3. Exhibit C3: Photograph of Plaintiff's Left Arm Post-Surgery;
4. Exhibit C4: Photograph of Plaintiff's Left Arm Post-Surgery;
5. Exhibit C5: Photograph of Plaintiff's Left Wrist;
6. Exhibit C6: Photograph of Plaintiff in Hardware Post-Surgery; and
7. Exhibit C7: X-Ray of Plaintiff's Arm Following Installation of Hardware.

Plaintiff's medical bills presently total more than \$275,000.00. Based on her medical bills, pain and suffering and other damages, Plaintiff will request a damages award of \$2,000,000.00 for

compensatory damages, attorneys' fees pursuant to Virginia Code § 59.1-206, and pre-judgment and post-judgment interest.

DATE: November 15, 2021

Respectfully submitted,

SHERI WADE

By: _____ /s/
Counsel

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